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8/25/08

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August 13, 2008

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Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

CONSENT APPLICATION

Re: Great Northern Insurance Co.
v. Blue Anchor Line, et al.
08 Civ. 3308 (SHS) (GWG)
Our File: 7C-1580

Dear Judge Gorenstein:

I represent the plaintiff in this admiralty action which involves a claim for damage to a shipment of wine. Defendants Blue Anchor Line, Kuehne & Nagel, Inc., and Kuehne & Nagel, S.A. have filed a motion to dismiss the complaint. The opposition to the motion is presently due on August 18, 2008. Counsel have conferred and respectfully join in proposing the following adjusted schedule for the motion:

Opposition papers.....September 3, 2008
Reply papers.....September 10, 2008

This is the first request for an extension of the motion deadlines. Counsel for the moving parties has graciously agreed to the extension. The Court's attention is appreciated.

Respectfully,

David L. Mazaroli

cc: Burke & Parsons
Attn.: Keith W. Heard, Esq. (Ref.: 9059)
(Via e-mail: heard@burkeparsons.com)

Ernest H. Gelman, Esq. (Via e-mail: egelman@gelmanesq.com)

SO ORDERED: DATE 8/25/08
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE